

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Ronaldo Ligons, et al.,

Civil File No. 15-CV-2210 (PJS/BRT)

Plaintiffs,

vs.

**DEFENDANTS' REBUTTAL  
EXPERT WITNESS  
DISCLOSURE**

Minnesota Department of Corrections, et al.,

Defendants.

TO: PLAINTIFFS Ronaldo Ligons and Barry Michaelson, and their attorney, Peter J. Nickitas, Peter J. Nickitas Law Office, L.L.C., 431 S. 7<sup>th</sup> St., Suite 2446, P.O. Box 15221, Minneapolis, MN 55415-0221.

PLEASE BE ADVISED that Defendants Minnesota Department of Corrections, Thomas Roy, Dr. David A. Paulson, and Nanette Larson (collectively "Defendants") may call the following rebuttal expert witnesses at the trial in this matter:

1. Dr. Newton E. Kendig, M.D.  
7938 West Beach Drive NW  
Washington, D.C. 20012  
nekendig@icloud.com

Dr. Kendig's rebuttal testimony will be based on the opinions described in his initial report dated October 19, 2016.

2. Dr. David Paulson  
1450 Energy Park Dr.  
#200  
St Paul, MN 55108

While he is not an expert retained for the purpose of litigation, Defendants may call Dr. David Paulson, who is a medical professional, to rebut Plaintiffs' experts' testimony.

3. Defendants reserve the right to call any other rebuttal expert witnesses identified by any party in this matter.
4. Defendants reserve the right to identify additional rebuttal experts in any area of expertise in which an expert has been designated by any other party.

5. Defendants reserve the right to name additional rebuttal experts who may be discovered after the date of this notice, and to amend this list in the future as appropriate.

Dated: November 29, 2016

OFFICE OF THE ATTORNEY GENERAL  
State of Minnesota

s/ Ian M. Welsh

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